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 Tiare Ramirez*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I
 through X; and ROE Corporations XI
 through XX inclusive,

Defendant.

Case No. 2:19-cv-01174-APG-EJY

**STIPULATION AND ORDER TO
 CONTINUE TRIAL**

(Second Request)

STIPULATION AND ORDER TO CONTINUE TRIAL

Pursuant to LR IA 6-1 and IA 6-2, and LR 7-1 and 26-3, Plaintiff Tiare Ramirez ("Plaintiff") and Defendant Wynn Las Vegas, LLC ("Defendant"), by and through their respective attorneys of record, hereby stipulate to continue the trial, which is currently scheduled for the stacked calendar of April 8, 2024, for at least one hundred fifty (150) days to a date convenient to the Court. This is the second request for an extension to continue the trial. The requested extension is sought in good faith and not for purposes of delay.

Plaintiff's lead trial counsel recently fell ill, received emergency transport, and was hospitalized in ICU with congestive pneumonia and is still treating and in recovery. Further, Plaintiff's lead trial counsel is currently assisting an ailing family member. The length of continuance requested is requested due to the foregoing

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and further informed by the needs of counsel for Defendant. Specifically, the length of continuance requested will enable Defendant's trial counsel Ms. Stegall, who anticipates commencing maternity leave which is expected to last through August of this year, to participate in trial. Also, Defendant's trial counsel has upcoming arbitration and trial dates in May and June and is out of the country July 19-30, 2024. Finally, the parties will continue to work together in good faith regarding outstanding evidentiary issues and the presentation of evidence at trial.

Therefore, the parties request that the currently scheduled trial dates be continued at least one hundred fifty (150) days to a time convenient for the Court.

IT IS SO STIPULATED.

Dated: March 6, 2024

Dated: March 6, 2024

Respectfully submitted,

Respectfully submitted,

/s/ Christian Gabroy

/s/ Kelsey Stegall

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ORDER

IT IS ORDERED that the trial scheduling conference scheduled for March 19, 2024 is vacated and continued to August 27, 2024 at 9:00 a.m. The calendar call scheduled for April 2, 2024 is vacated and continued to September 17, 2024 at 9:00 a.m. The trial currently scheduled for April 8, 2024 is vacated and continued to September 23, 2024 at 9:00 a.m. All in Courtroom 6C.

IT IS SO ORDERED:

Dated: March 7, 2024



ANDREW P. GORDON
 UNITED STATES DISTRICT JUDGE